

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

PETRA PATTERSON,

Plaintiff,

v.

HMR OF MARYLAND, LLC,

Defendant.

Case No.8:21-cv-01333-TJS

DEFENDANT HMR OF MARYLAND, LLC'S MOTION FOR SUMMARY JUDGMENT

Defendant HMR of Maryland, LLC (“HMR” or “Defendant”), by and through its undersigned counsel, brings the following Motion for Summary Judgment against Plaintiff Petra Patterson (“Ms. Patterson” or “Plaintiff”), and requests that the Court grant judgment as a matter of law in Defendant’s favor as to the entirety of the Second Amended Complaint because:

1. HMR suspended and then terminated Ms. Patterson’s employment because she violated the legal regulations and company policy pertaining to ensuring the safety of the residents at Charlotte Hall Veterans Home, regulations and procedures of which she had actual knowledge; and
2. Ms. Patterson cannot create a genuine dispute of material fact that HMR’s legitimate reason for suspension and termination were mere pretext, and that HMR’s real reasons for the actions it took against Ms. Patterson were unlawful discriminatory and/or retaliatory animus.

WHEREFORE, Defendant HMR of Maryland, LLC requests that the Court grant its Motion for Summary Judgment, and enter judgment as a matter of law in its favor as to the entirety of the Second Amended Complaint, and dismiss Plaintiff’s lawsuit with prejudice.

Dated: August 12, 2022

Respectfully submitted,

/s/ Meredith L. Schramm-Strosser

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CERTIFICATE OF SERVICE

I hereby certify that, on August 12, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF filing system, and that copies were served electronically via the Court's ECF system, upon the following:

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/s/ Meredith L. Schramm-Strosser
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